



Environmental Health Trust, November 2012

[www.ehtrust.org](http://www.ehtrust.org)

February 06, 2013

Office of the Secretary  
Federal Communications Commission  
445 12th St., S.W., Room TW-A325  
Washington, D.C. 20554

RE: Comments for the Matter of Service Rules for the Advanced Wireless Services H Block (WT Docket No. 12-357).

Dear Federal Communications Commission Commissioners:

We write to request that the RF Safety Standard be updated to be more protective of public health from known possible adverse EMF radiation impacts as soon as possible. Importantly, we also strongly request that no new PCS or AWS bands including H block be permitted for use in the spectrum until the after the RF Safety Standard and the needed Spectrum Act Technical Rules are fully updated to ensure protection of children, females, disabled and others in the exposed population.

We request that FCC update of the RF Safety Standards and applicable technical rules and include a full public process. We request this such that you provide further opportunity to participate and provide scientific information and dialogue on this topic. We think that there is great need for further engagement with the public to ensure that the Standards become more protective of the public. We ask for greater opportunity to submit to the FCC more on the large amount of available published research that should be included.

We ask that the RF Safety Standards and applicable technical rules be updated as soon as possible since in May 2011, an expert committee of the International Agency for Research on Cancer (IARC) of the World Health Organization (WHO) classified "cell phone radiation as possibly carcinogenic to humans"--a category shared with lead, engine exhaust, DDT, and jet fuel. In light of this nearly unanimous position, the IARC Director, Christopher Wild MD, PhD



Environmental Health Trust, November 2012

[www.ehtrust.org](http://www.ehtrust.org)

damages brain function, structure and behavior and suggested that these exposures could contribute to children's behavioral disorders.

Also we ask you to update the RF Safety Standards and applicable technical rules as soon as possible since in July 2012, the U.S. Government Accountability Office (GAO) issued a review of cell phone testing, entitled, "Exposure and Testing of Mobile Phones Should be Reassessed", prompted in part by an EHT expert peer-reviewed report on brain modeling, prepared by former industry advisors, Om P. Gandhi, Alvaro De Salles and others. The Washington Post reported that, "The GAO has found the Federal Communications Commission's cell phone-safety regulations are woefully out of date. Congress may also urge the agency, whose radiation-limit rules are 21 years old, to take a fresh look at how children in particular may be affected by radio waves."

Similarly, also we ask FCC to please update the RF Safety Standards and applicable technical rules as soon as possible to address children's health since the American Academy of Pediatrics (AAP) Chairman Robert Block M.D. recently wrote to FCC urging reconsideration and review of standards specifically noting that:

*"Children, however, are not little adults and are disproportionately impacted by all environmental exposures, including cell phone radiation. In fact, according to [the International Agency for Research on Cancer], when used by children, the average RF energy deposition is two times higher in the brain and 10 times higher in the bone marrow of the skull, compared with mobile phone use by adults."*

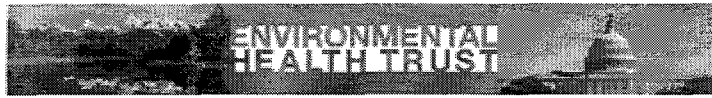
In November EHT co-hosted with the Collaborative of Health and the Environment's EMF Workgroup (CHE-EMF) an important Expert Forum at the National Press Club in Washington DC. Six global experts and eminent scientists from several countries and discussed the new studies on the of cell phone use, especially for pregnant women, fetuses and men of reproductive age. We ask FCC to update the RF Safety Standards and applicable technical rules as soon as possible since all of the November Expert Forum experts unanimously agreed and presented updated published scientific findings supporting the immediate need for the US to update its current outdated RF Safety Standards. The following experts presented: (see



Environmental Health Trust, November 2012

[www.ehtrust.org](http://www.ehtrust.org)

2. **Dr. Igor Belyaev**, PhD, Professor, Head Research Scientist, Cancer Research Institute of Slovak Academy of Science, Head Research Scientist, Institute of General Physics, Russian Academy of Sciences presented on the biological and health effects of electromagnetic fields and ionizing radiation including DNA damage and repair, chromosomal aberrations, apoptosis, molecular markers for radio sensitivity.
3. **Dr. Devra Davis**, PhD, MPH, Lecturer, President and Founder, Environmental Health Trust is an award-winning, internationally renowned scientist and founding director of the Board on Environmental Studies and Toxicology of the US National Research Council, National Academy of Sciences presented on cell phone radiation and human health.
4. **Dr. Nesrin Seyhan**, PhD, Gazi University, Turkey, Professor and Head Biophysics Department, is Head of Biophysics Department, founder and director of Gazi Non-Ionizing Radiation Protection (GNRP) Center, Bioelectromagnetics Advisory Committee member, for the World Health Organization (WHO), the National Representative for the WHO EMF International Advisory Committee, Panel member, with the NATO Research Technology Organization (RTO), Human Factors and Medicine (HFM) presented on the non-ionizing radiation ELF and RF EMF biological effects including lipid peroxidation, immune system and collagen synthesis.
5. **Dr. Hugh Taylor**, MD, PhD, Yale University, Chair of Obstetrics/Gynecology, is Professor and Chairman of Obstetrics, Gynecology and Reproductive Sciences, and Director of Reproductive Endocrinology and Infertility at the Yale University School of Medicine, recipient of eight National Institutes of Health research grants, Director of the Yale Center for Reproductive Biology, Editor-In-Chief of Reproductive Sciences, presented on important new study finding that prenatal exposures to cellphone radiation significantly alter brain chemistry and increase behavioral disorders in mice.
6. **Dr. Ronald Herberman**, President for Research and Development TNI Bio Tech Inc., Bethesda, Maryland, Founding Director Emeritus at the University of Pittsburgh Cancer Institute, 1985-2009, Founding Director University of Pittsburgh Cancer Institute (UPCI) and the UPMC Cancer Center and Professor of Medicine & Biology, past president of the American Association of Cancer Institute and the Society for Biological Therapy and



Environmental Health Trust, November 2012

[www.ehtrust.org](http://www.ehtrust.org)

In conclusion, we request that the US RF Safety Standards be updated as soon as possible to be more protective of public health AND we also strongly request that FCC permit no new PCS or AWS bands including H block for use in the spectrum until the after the RF Safety Standard and the needed Spectrum Act Technical Rules are fully updated to ensure protection of children, females, disabled and others in the exposed population.

Sincerely,  
Antoinette "Toni" Stein  
Acting Director of Program Development  
Environmental Health Trust  
P.O. Box 58 Teton Village, WY 83025 USA  
650-823-7662  
[tweil@igc.org](mailto:tweil@igc.org)